

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
BALTIMORE DIVISION**

National Association of Diversity Officers
in Higher Education, et al.,

Plaintiffs,

v.

Donald J. Trump, in his official capacity as
President of the United States, et al.,

Defendants.

Civil Action No. 1:25-cv-333-ABA

DECLARATION OF ANANDA V. BURRA

I, Ananda Burra, state and declare as follows:

1. I am an attorney at Democracy Forward Foundation and counsel to all Plaintiffs in the above-captioned matter. I submit this Declaration in support of the Memorandum of Law in Support of Plaintiffs' Motion to Clarify Preliminary Injunction Order.

2. A true and correct copy of an email from counsel for Plaintiffs to counsel for Defendants, dated February 25, 2025, is attached hereto as **Exhibit A**.

3. A true and correct copy of an email from counsel for Defendants to counsel for Plaintiffs, dated February 25, 2025, is attached hereto as **Exhibit B**.

4. A true and correct copy of email correspondence between counsel for Defendants and counsel for Plaintiffs, between February 26, 2025, and February 27, 2025, is attached hereto as **Exhibit C**.

5. Counsel for Plaintiffs served a copy of the Court's February 24 Order on the following non-named agencies on February 27 via FedEx overnight delivery, and informed counsel for Defendants of this service.

- (a) Department of Homeland Security
- (b) Department of Defense
- (c) Department of State
- (d) National Endowment for the Arts
- (e) National Endowment for the Humanities
- (f) Federal Communications Commission
- (g) Department of Veterans Affairs
- (h) National Archives and Records Administration
- (i) Small Business Administration
- (j) United States Postal Service
- (k) Environmental Protection Agency
- (l) Department of Housing and Urban Development
- (m) Department of the Treasury
- (n) Corporation of National and Community Service (AmeriCorps)

6. Counsel for Plaintiffs also sent an email with a copy of the Court's order to the offices of general counsel at the following non-named agencies on February 27, copying counsel for Defendants. Counsel for Plaintiffs were unable to find email addresses for general counsel at the remaining agencies listed in paragraph 5, above.

- (a) Department of Defense
- (b) National Endowment for the Arts

- (c) National Endowment for the Humanities
- (d) National Archives and Records Administration
- (e) United States Postal Service
- (f) Department of the Treasury
- (g) Corporation of National and Community Service (AmeriCorps)

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed: February 27, 2025

/s/ Ananda V. Burra
Ananda V. Burra